



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL**

1301 CONSTITUTION AVE, NW
WASHINGTON, DC 20004

CASE #: OI-HQ-2018-ADM-0082

CROSS REFERENCE #: N/A

TITLE: PRUITT, E. SCOTT, ADMINISTRATOR, OA

INTERVIEWEE (if applicable): N/A

PREPARED BY: SPECIAL AGENT (b) (6), (b) (7)(C)

**MEMORANDUM OF ACTIVITY
EVIDENCE**

NARRATIVE: On December 4, 2018, Special Agent (b) (6), (b) (7)(C)

Environmental Protection Agency (EPA), retrieved the following items from the OI, OIG Washington Field Office (WFO) evidence storage room located at the EPA William J. Clinton Building – (b) (7)(E).

1. 1 Verbatim DVD+R 16X – Interview of (b) (6), (b) (7)(C) – Burned June 13, 2018
2. 1 Verbatim DVD+R 16X – Interview of (b) (6), (b) (7)(C) – Burned June 7, 2018

The aforementioned items will be retained with the case file. Corresponding evidence custody sheets are attached in the following section of this document [Attachment 1&2].

ATTACHMENT(S):

1. 1 Verbatim DVD+R 16X – Interview of (b) (6), (b) (7)(C) – Burned June 13, 2018



evidence custody
sheet - DVD-R interv

2. 1 Verbatim DVD+R 16X – Interview of (b) (6), (b) (7)(C) – Burned June 7, 2018



evidence custody
sheet - DVD-R inter

CASE:
OI-HQ-2018-ADM-0082

DATE OF ACTIVITY:
December 4, 2018

INTERVIEWEE (if applicable):
N/A

DRAFTED DATE:
December 4, 2018

AGENT(S):
SA (b) (6), (b) (7)(C)

RESTRICTED INFORMATION
Page 1 of 1

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL**

1301 CONSTITUTION AVE, NW
WASHINGTON, DC 20004

CASE #: OI-HQ-2018-ADM-0082

CROSS REFERENCE #: N/A

TITLE: PRUITT, E. SCOTT, ADMINISTRATOR, OA

INTERVIEWEE (if applicable): N/A

PREPARED BY: (b) (6), (b) (7)(C), SPECIAL AGENT

**MEMORANDUM OF ACTIVITY
EVIDENCE**

NARRATIVE: On December 12, 2018, Special Agent (b) (6), (b) (7)(C)

Environmental Protection Agency (EPA), transferred the items listed on the attached evidence custody form to (b) (6), (b) (7)(C) OPR, OI, OIG, EPA [Attachment 1].

ATTACHMENT(S):

1. Evidence Custody Form – 12DEC2018



evidence custody
form 12DEC2018.pdf

CASE:
OI-HQ-2018-ADM-0082

DATE OF ACTIVITY:
December 12, 2018

INTERVIEWEE (if applicable):
N/A

DRAFTED DATE:
December 12, 2018

AGENT(S):
SA (b) (6), (b) (7)(C)

RESTRICTED INFORMATION
Page 1 of 1

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL**

1301 CONSTITUTION AVE, NW
WASHINGTON, DC 20004

CASE #: OI-HQ-2018-ADM-0082

CROSS REFERENCE #: OI-HQ-2018-ADM-0086

TITLE: PRUITT, E. SCOTT, ADMINISTRATOR, OA

INTERVIEWEE (if applicable): N/A

PREPARED BY: SPECIAL AGENT (b) (6), (b) (7)(C)

**MEMORANDUM OF ACTIVITY
OTHER**

NARRATIVE:

On March 14, 2019, Special Agent (b) (6), (b) (7)(C) contacted former Assistant Special Agent in Charge, (b) (6), (b) (7)(C) EPA via telephone to confirm a consultation between ASAC (b) (6), (b) (7)(C) and the United States Department of Justice (USDOJ).

The purpose of the consultation was to ensure that the USDOJ identified no applicable criminal charges no did they have any prosecutorial interest.

SA (b) (6), (b) (7)(C) was informed by former ASAC (b) (6), (b) (7)(C) that (b) (6), (b) (7)(C) presented the facts of the investigation to the Assistant United States Attorney Sonali Patel, United States Attorney's Office, District of Columbia for consultation. ASAC (b) (6), (b) (7)(C) stated that AUSA Patel verbally informed (b) (6), (b) (7)(C) that his office has no prosecutorial interest in this investigation.

ATTACHMENT(S):

- None

CASE:
OI-HQ-2018-ADM-0082

DATE OF ACTIVITY:
March 14, 2019

INTERVIEWEE (if applicable):
N/A

DRAFTED DATE:
March 15, 2018

AGENT(S):
SA (b) (6), (b) (7)(C)

RESTRICTED INFORMATION
Page 1 of 1

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL**
1301 CONSTITUTION AVE, NW
WASHINGTON, DC 20004

CASE #: OI-HQ-2018-ADM-0082

CROSS REFERENCE #: N/A

TITLE: Pruitt, E. Scott Administrator, OA

INTERVIEWEE (if applicable): N/A

PREPARED BY: Special Agent (b) (6), (b) (7)(C)

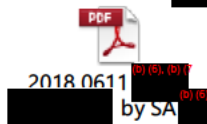
**MEMORANDUM OF ACTIVITY
OTHER**

NARRATIVE:

On June 27, 2018, Special Agent (b) (6), (b) (7)(C) Environmental Protection Agency, received an email from Malloy Transcription Service containing a transcript of the OIG interview of former EPA employee (b) (6), (b) (7)(C) [Attachment 1].

ATTACHMENT(S):

1. Interview of (b) (6), (b) (7)(C) Transcript



CASE:
OI-HQ-2018-ADM-0082

INTERVIEWEE (if applicable):
N/A

DATE OF ACTIVITY:
June 27, 2018

DRAFTED DATE:
July 18, 2018

AGENT(S):
SA (b) (6), (b) (7)(C)

RESTRICTED INFORMATION
Page 1 of 1

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL**

1301 CONSTITUTION AVE, NW
WASHINGTON, DC 20004

DATE: MARCH 29, 2019

PREPARED BY: SA (b) (6), (b) (7)(C)

CASE #: OI-HQ-2018-ADM-0082

CROSS REFERENCE #: N/A

TITLE: PRUITT, E. SCOTT; POLITICAL APPOINTEE, ADMINISTRATOR, OA, EPA

CASE CLOSING REPORT

| Subject(s) | Location | Other Data |
|----------------------------|-----------------|-------------------|
| Administrator Scott Pruitt | Washington, DC | N/A |

ALLEGATIONS:

On April 9, 2018, the Office of Investigations (OI), Office of Inspector General, Environmental Protection Agency (EPA), received a memorandum from Kevin Minoli (Minoli), Principal Deputy General Counsel and Designated Agency Ethics Official, EPA. The memorandum, dated April 6, 2018, was issued by the United States Office of Government Ethics and addressed to Minoli. Pursuant to this memorandum, a case was opened to administratively investigate the following allegation: Did Administrator Pruitt have subordinates at the EPA assist him in finding personal housing.

On June 7, 2018, OI expanded the investigation to include the following allegations; (1) Did Administrator Pruitt use his official position and EPA staff to seek a “business opportunities” for (b) (6), (b) (7)(C); (2) Did Administrator Pruitt enlist subordinates at the EPA secure a mattress for his personal use; and (3) Did Administrator Pruitt have his security detail run personal errands for him.

FINDINGS:

All allegations are deemed inconclusive. Administrator Pruitt resigned from the EPA prior to the conclusion of the investigation; therefore, was no longer subject to the administrative Standards of Conduct.

DISPOSITION:

Based upon the aforementioned, there are no further investigative steps and this investigation is recommended for closure.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

SEP 10 2018

THE INSPECTOR GENERAL

Mr. Emory A. Rounds III
Director
U.S. Office of Government Ethics
1201 New York Avenue, NW, Suite 500
Washington, D.C. 20005

Dear Mr. Rounds:

By letter dated June 15, 2018, David J. Apol, then acting Director and General Counsel, U.S. Office of Government Ethics (OGE), requested that my office investigate certain reports in the press of allegations of ethical misconduct by Scott Pruitt, who was at the time the Administrator of the U.S. Environmental Protection Agency (EPA). Mr. Apol also referred me to his letter of April 6, 2018, to Kevin Minoli, the EPA's Principal Deputy General Counsel and Designated Agency Ethics Official, in which Mr. Apol had raised concerns of other possible violations of the Standards of Ethical Conduct for Employees of the Executive Branch (Standards of Conduct) by Mr. Pruitt while in office. Mr. Apol requested that we complete a review of the matters (both the previous ones he had raised in his April 6 letter and the new allegations) "so that [OGE] can decide whether to begin a formal corrective action proceeding in order to make a formal recommendation to the President."

Mr. Pruitt resigned his position as the EPA Administrator on July 5, 2018. Since then, our respective staffs have discussed what appropriate actions should be taken regarding the allegations your office referred to us concerning Mr. Pruitt's compliance with the Standards of Conduct. As you know, administrative penalties for violations of the Standards of Conduct can result in disciplinary action up to and including removal. However, as Mr. Pruitt's resignation precludes his being subject to any such potential administrative penalties with regard to these allegations, we understand that the OGE is no longer requesting that we review Mr. Pruitt's alleged actions for potential administrative violations of the Standards of Conduct. As such, the OIG does not intend to pursue the requests in your April 6 and June 15 letters to the extent that they would constitute administrative violations of the Standards of Conduct.

I would appreciate it if you would please confirm your agreement with our intended approach. If you have any questions about this, please contact Alan Larsen, Counsel to the Inspector General, at (202) 566-2391.

Sincerely,

A handwritten signature in blue ink, which appears to read "Arthur A. Elkins Jr.", is positioned above the printed name.

Arthur A. Elkins Jr.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL**

1301 CONSTITUTION AVE, NW
WASHINGTON, DC 20004

CASE #: OI-HQ-2018-ADM-0086

CROSS REFERENCE #: Case number

TITLE: Pruitt, E. Scott, Administrator, OA

INTERVIEWEE (if applicable): N/A

PREPARED BY: (b) (6), (b) (7)(C)

**MEMORANDUM OF ACTIVITY
RECORDS REVIEW**

NARRATIVE:

On July 6, 2018, Assistant Special Agent in Charge (ASAC) (b) (6), (b) (7)(C)

United States Environmental Protection Agency (EPA), completed a review the Fiscal Year 2017 Hypothetical Small Area Fair Market Rents (Attachment), which was published by the United States Department of Housing and Urban Development on their website at https://www.huduser.gov/portal/datasets/fmr/fmrs/FY2017_code/2017summary_sa.odn. For the subject property, located at (b) (6), (b) (7)(C) C Street NE, Washington, DC 20002, the query revealed the following, in substance:

**Washington-Arlington-Alexandria, DC-VA-MD-WV MSA Hypothetical Small Area FMRs
By Unit Bedrooms***

| Zip Code | Efficiency | One-Bedroom | Two-Bedroom | Three-Bedroom | Four-Bedroom | Zip/CBS A Ratio |
|----------|------------|-------------|-------------|---------------|--------------|-----------------|
| 20002 | \$1,110 | \$1,160 | \$1,340 | \$1,750 | \$2,190 | 0.831 |

*Fair Market Rents (FMRs) are used to determine payment standard amounts for the Housing Choice Voucher program, to determine initial renewal rents for some expiring project-based Section 8 contracts, to determine initial rents for housing assistance payment (HAP) contracts in the Moderate Rehabilitation Single Room Occupancy program (Mod Rehab), rent ceilings for rental units in both the HOME Investment Partnerships program and the Emergency Solution Grants program, calculation of maximum award amounts for Continuum of Care recipients and

CASE:
OI-HQ-2018-ADM-0086

INTERVIEWEE (if applicable):
N/A

DATE OF ACTIVITY:
July 6, 2018

DRAFTED DATE:
July 6, 2018

AGENT(S):

(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
Page 1 of 2

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.

the maximum amount of rent a recipient may pay for property leased with Continuum of Care funds, and calculation of flat rents in Public Housing units.
(www.huduser.gov/portal/datasets/fmr)

ATTACHMENT(S):

FY2017 HYPOTHETICAL SMALL AREA FMRS FOR WASHINGTON-ARLINGTON-
ALEXANDRIA, DC-VA-MD-WV MSA



FY2017
HYPOTHETICAL SMAI

CASE:
OI-HQ-2018-ADM-0086

DATE OF ACTIVITY:
July 6, 2018

INTERVIEWEE (if applicable):
N/A

DRAFTED DATE:
July 6, 2018

AGENT(S):

(b) (6), (b) (7)(C)

RESTRICTED INFORMATION

Page 2 of 2

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL**

1301 CONSTITUTION AVE, NW
WASHINGTON, DC 20004

CASE #: OI-HQ-2018-ADM-0086

CROSS REFERENCE #: Case number

TITLE: Pruitt, E. Scott, Administrator, OA

INTERVIEWEE (if applicable): N/A

PREPARED BY: (b) (6), (b) (7)(C)

**MEMORANDUM OF ACTIVITY
DOCUMENT REVIEW**

NARRATIVE:

On June 19, 2018, Assistant Special Agent in Charge (ASAC) (b) (6), (b) (7)(C), United States Environmental Protection Agency (EPA), received an email (Attachment 1) from Matt Leopold, General Counsel, Office of General Counsel, EPA, that contained an attached document titled "Emails Related to Ethics Opinion" (Attachment 2). ASAC (b) (6), (b) (7)(C) reviewed the attached document, which was an email from (b) (6), (b) (7)(C), Reporter, CNN, dated April 25, 2018, requesting a comment for an upcoming Congressional hearing involving Administrator Scott Pruitt.

ATTACHMENT(S):

1. Email from Matt Leopold, dated 2018.06.19



Email from Matt
Leopold, dated 2018

2. Emails Related to Ethics Opinion from Matt Leopold



Emails Related to
Ethics Opinion from

CASE:
OI-HQ-2018-ADM-0086
DATE OF ACTIVITY:
June 19, 2018

INTERVIEWEE (if applicable):
N/A
DRAFTED DATE:
July 6, 2018

AGENT(S):

(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
Page 1 of 1

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL
1301 CONSTITUTION AVE, NW
WASHINGTON, DC 20004

CASE #: OI-HQ-2018-ADM-0086

CROSS REFERENCE #: Case number

TITLE: Pruitt, E. Scott, Administrator, OA

INTERVIEWEE (if applicable): N/A

PREPARED BY: (b) (6), (b) (7)(C)

MEMORANDUM OF ACTIVITY
DOCUMENT REVIEW

NARRATIVE:

On September 4, 2018, Assistant Special Agent in Charge (ASAC) (b) (6), (b) (7)(C) United States Environmental Protection Agency (EPA), received an email (Attachment 1) from (b) (6), (b) (7)(C), that contained a letter (Attachment 2) that he wrote to Arthur Elkins, Inspector General, OIG, EPA. ASAC (b) (6), (b) (7)(C) reviewed the letter, which revealed that (b) (6), (b) (7)(C) requested that the OIG redact the names and all personal information of (b) (6), (b) (7)(C) clients, (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C), from any reports that pertain to their interviews or requested information that they provided.

ATTACHMENT(S):

1. Email from (b) (6), (b) (7)(C) dated 2018.09.04 re (b) (6), (b) (7)(C) Names in Reports



2. Letter from (b) (6), (b) (7)(C), dated 2018.09.04 re (b) (6), (b) (7)(C) Names in Reports



CASE:
OI-HQ-2018-ADM-0086
DATE OF ACTIVITY:
September 4, 2018

INTERVIEWEE (if applicable):
N/A
DRAFTED DATE:
September 5, 2018

AGENT(S):
(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
Page 1 of 1

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL**

1301 CONSTITUTION AVE, NW
WASHINGTON, DC 20004

CASE #: OI-HQ-2018-ADM-0086

CROSS REFERENCE #: N/A

TITLE: PRUITT, E. SCOTT, ADMINISTRATOR, OA

INTERVIEWEE (if applicable): N/A

PREPARED BY: SPECIAL AGENT (b) (6), (b) (7)(C)

**MEMORANDUM OF ACTIVITY
EVIDENCE**

NARRATIVE:

On March 4, 2019, Special Agent (b) (6), (b) (7)(C) Environmental Protection Agency (EPA), retrieved the following items from the OI, OIG, Washington Field Office (WFO) evidence storage room located at the EPA William J. Clinton Building – (b) (7)(E).

1. 1 Verbatim Compact Disc – Recording of Interview Marked “Burned May 15, 2018”
2. 1 Verbatim Compact Disc – Recording of Interview Marked “Burned May 21, 2018”

The items will be retained with the case file. Corresponding evidence custody sheets are attached in the following section of this document [Attachment 1 & 2].

ATTACHMENT(S):

1. 1 Verbatim Compact Disc – Recording of Interview Marked “Burned May 15, 2018”



0086 - Evidence
Custody Sheet - CD

2. 1 Verbatim Compact Disc – Recording of Interview Marked “Burned May 21, 2018”



0086 - Evidence
Custody Sheet - CD

CASE:
OI-HQ-2018-ADM-0086

DATE OF ACTIVITY:
March 4, 2019

INTERVIEWEE (if applicable):
N/A

DRAFTED DATE:
March 4, 2019

AGENT(S):
SA (b) (6), (b) (7)(C)

RESTRICTED INFORMATION
Page 1 of 1

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL
1301 CONSTITUTION AVENUE, NW
WASHINGTON DC 20004

DATE: MARCH 11, 2019

PREPARED BY: SA (b) (6), (b) (7)(C)

CASE #: OI-HQ-2018-ADM-0086

CROSS REFERENCE #: N/A

TITLE: PRUITT, E. SCOTT, ADMINISTRATOR, OA

CASE CLOSING REPORT

| Subject(s) | Location | Other Data |
|-----------------|------------------|------------|
| E. SCOTT PRUITT | WASHINGTON, D.C. | N/A |

ALLEGATIONS:

On April 9, 2018, Assistant Inspector General of Investigations (AIGI) Patrick Sullivan (Sullivan), Office of Investigations (OI), Office of Inspector General (OIG), Environmental Protection Agency (EPA), received a memorandum from Kevin Minoli (Minoli), Principal Deputy General Counsel and Designated Agency Ethics Official, EPA.

At the direction of AIGI Sullivan, an administrative case was opened to investigate the following allegation: (1) Did Administrator Pruitt's rental agreement with (b) (6), (b) (7)(C) constitute a gift.

INVESTIGATIVE FINDINGS:

Administrator Pruitt resigned from the EPA prior to the conclusion of the investigation. The allegation is inconclusive.

RECOMMENDATION:

Based upon the aforementioned, there are no further investigative steps and this investigation is recommended for closure.

RESTRICTED INFORMATION

Page 1

This report is the property of the Office of Investigations and is loaned to your agency; it and its contents may not be reproduced without written permission. The report is FOR OFFICIAL USE ONLY and its disclosure to unauthorized persons is prohibited. Public availability to be determined under 5 U.S.C. 552.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

SEP 10 2018

THE INSPECTOR GENERAL

Mr. Emory A. Rounds III
Director
U.S. Office of Government Ethics
1201 New York Avenue, NW, Suite 500
Washington, D.C. 20005

Dear Mr. Rounds:

By letter dated June 15, 2018, David J. Apol, then acting Director and General Counsel, U.S. Office of Government Ethics (OGE), requested that my office investigate certain reports in the press of allegations of ethical misconduct by Scott Pruitt, who was at the time the Administrator of the U.S. Environmental Protection Agency (EPA). Mr. Apol also referred me to his letter of April 6, 2018, to Kevin Minoli, the EPA's Principal Deputy General Counsel and Designated Agency Ethics Official, in which Mr. Apol had raised concerns of other possible violations of the Standards of Ethical Conduct for Employees of the Executive Branch (Standards of Conduct) by Mr. Pruitt while in office. Mr. Apol requested that we complete a review of the matters (both the previous ones he had raised in his April 6 letter and the new allegations) "so that [OGE] can decide whether to begin a formal corrective action proceeding in order to make a formal recommendation to the President."

Mr. Pruitt resigned his position as the EPA Administrator on July 5, 2018. Since then, our respective staffs have discussed what appropriate actions should be taken regarding the allegations your office referred to us concerning Mr. Pruitt's compliance with the Standards of Conduct. As you know, administrative penalties for violations of the Standards of Conduct can result in disciplinary action up to and including removal. However, as Mr. Pruitt's resignation precludes his being subject to any such potential administrative penalties with regard to these allegations, we understand that the OGE is no longer requesting that we review Mr. Pruitt's alleged actions for potential administrative violations of the Standards of Conduct. As such, the OIG does not intend to pursue the requests in your April 6 and June 15 letters to the extent that they would constitute administrative violations of the Standards of Conduct.

I would appreciate it if you would please confirm your agreement with our intended approach. If you have any questions about this, please contact Alan Larsen, Counsel to the Inspector General, at (202) 566-2391.

Sincerely,

Arthur A. Elkins Jr.

From: (b) (6), (b) (7)(C)
To: (b) (6), (b) (7)(C)
Cc: (b) (6), (b) (7)(C)
Subject: RE: Subpoena of (b) (6), (b) (7)(C)
Date: Tuesday, September 04, 2018 4:28:46 PM
Attachments: (b) (6), (b) (7)(C).EPA.090418.pdf

(b) (6), (b) (7)(C) and (b) (6), (b) (7)(C):

Please see the attached letter and confirm receipt. Any other updates to report? Thanks.

(b) (6), (b) (7)(C)
(b) (6), (b) (7)(C)
(b) (6), (b) (7)(C)
(b) (6), (b) (7)(C)
(b) (6), (b) (7)(C)
Washington, DC 20036

(b) (6), (b) (7)(C) (Tel.)
(b) (6), (b) (7)(C)
(b) (6), (b) (7)(C)

This e-mail may contain confidential or privileged information. If you are not the intended recipient, please advise by return e-mail and delete immediately without reading forwarding to others. The following statement is provided pursuant to U.S. Treasury Department Regulations: This communication is not intended or written to be used, and cannot be used, by a taxpayer for the purpose of avoiding penalties that the Internal Revenue Service may impose on the taxpayer.

From: (b) (6), (b) (7)(C)
Sent: Thursday, June 7, 2018 9:53 AM
To: (b) (6), (b) (7)(C)
Cc: (b) (6), (b) (7)(C)@epa.gov; (b) (6), (b) (7)(C)
(b) (6), (b) (7)(C)@epa.gov>
Subject: RE: Subpoena of (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C)

(b) (6), (b) (7)(C) — The investigators asked that I follow up on getting a copy of the floorplan, mentioned below.
Please advise.

Thank you,

(b) (6), (b) (7)(C)
(b) (6), (b) (7)(C), EPA OIG
(b) (6), (b) (7)(C)

From: (b) (6), (b) (7)(C)

Sent: Wednesday, May 30, 2018 3:50 PM

To: (b) (6), (b) (7)(C) >

Subject: RE: Subpoena of (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C)

Please see the Statements of Compliance attached.

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

[Washington, DC 20036](#)

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

This e-mail may contain confidential or privileged information. If you are not the intended recipient, please advise by return e-mail and delete immediately without reading forwarding to others. The following statement is provided pursuant to U.S. Treasury Department Regulations: This communication is not intended or written to be used, and cannot be used, by a taxpayer for the purpose of avoiding penalties that the Internal Revenue Service may impose on the taxpayer.

From: (b) (6), (b) (7)(C) [epa.gov](#)>

Sent: Tuesday, May 29, 2018 4:06 PM

To: (b) (6), (b) (7)(C)

Subject: RE: Subpoena of (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C)

(b) (6), (b) (7)(C) – Thank you and the (b) (6), (b) (7)(C) for their cooperation in responding to the subpoena. I have forwarded the materials and your note below to the investigators.

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C), EPA OIG

(b) (6), (b) (7)(C)

From: (b) (6), (b) (7)(C)

Sent: Tuesday, May 29, 2018 11:41 AM

To: (b) (6), (b) (7)(C) [@epa.gov](#)>

Subject: RE: Subpoena of (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

Please find attached documents responsive to the subpoena dated May 4, 2018 on behalf of both (b) (6), (b) (7)(C). The executed Statements of Compliance are forthcoming. While the (b) (6), (b) (7)(C)

produce these documents in a good faith effort to produce all documents responsive to the EPA's subpoena, they nevertheless reserve the right to supplement the production with any documents that should come to their attention subsequent to today. In addition, (b) (6), (b) (7)(C) believes (b) (6) may have communicated to Ryan Jackson about matters within the scope of your inquiry to Mr. Jackson at (b) (6), (b) (7)(C) from (b) (6), (b) (7)(C) prior email address (b) (6), (b) (7)(C) but (b) (6) no longer has access to that email address due (b) (6), (b) (7)(C) separation from (b) (6), (b) (7)(C).

During (b) (6), (b) (7)(C) interview with the OIG, the OIG requested a floorplan of (b) (6), (b) (7)(C) C Street but (b) (6) does not presently have one in (b) (6) custody. (b) (6) has, however, made a request for one to be provided and should it be obtained I will forward it along for your review.

Please don't hesitate to ask should you have any questions. Thanks.

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

[Washington, DC 20036](#)

(b) (6), (b) (7)(C)

This e-mail may contain confidential or privileged information. If you are not the intended recipient, please advise by return e-mail and delete immediately without reading forwarding to others. The following statement is provided pursuant to U.S. Treasury Department Regulations: This communication is not intended or written to be used, and cannot be used, by a taxpayer for the purpose of avoiding penalties that the Internal Revenue Service may impose on the taxpayer.

From: (b) (6), (b) (7)(C) <(b) (6), (b) (7)(C)@epa.gov>
Sent: Wednesday, May 9, 2018 12:17 PM
To: (b) (6), (b) (7)(C)
Subject: RE: Subpoena of (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C)

(b) (6), (b) (7)(C) – Thank you. We appreciate it.

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C), EPA OIG

(b) (6), (b) (7)(C)

From: (b) (6), (b) (7)(C)
Sent: Wednesday, May 09, 2018 12:12 PM
To: (b) (6), (b) (7)(C) <(b) (6), (b) (7)(C)@epa.gov>

Subject: Subpoena of (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C)

(b) (6), (b) (7)

I just wanted to drop you a note to let you know I am representing (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C) on the matter before your office, and do not anticipate any issue with responding to subpoena by the return date. Please let me know if you have any questions. Thanks.

(b) (6), (b) (7)(C)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[Washington, DC 20036](#)

(b) (6), (b) (7)(C)

This e-mail may contain confidential or privileged information. If you are not the intended recipient, please advise by return e-mail and delete immediately without reading forwarding to others. The following statement is provided pursuant to U.S. Treasury Department Regulations: This communication is not intended or written to be used, and cannot be used, by a taxpayer for the purpose of avoiding penalties that the Internal Revenue Service may impose on the taxpayer.

From: (b) (6), (b) (7)(C)
To:
Subject: RE: Request - Review of Facts and, if Appropriate, a Declination (OI-HQ-2018-ADM-0086)
Date: Friday, August 17, 2018 4:48:41 PM

Hi (b) (6), (b) (7)(C)

We concur with your recommendation and are declining to prosecute at this time.

Thanks,
Sonali

From: (b) (6), (b) (7)(C) @epa.gov>
Sent: Tuesday, August 14, 2018 2:38 PM
To: Patel, Sonali (USADC) <SPATEL2@usa.doj.gov>
Subject: Request - Review of Facts and, if Appropriate, a Declination (OI-HQ-2018-ADM-0086)

Good afternoon Sonali,

The following is in reference to case number (OI-HQ-2018-ADM-0086). I have been advised that the case below must be reviewed by an AUSA before closing due to direction from our Inspector General and well as guidance included in our Standard Operating Procedures for case closures. The OIG opened the below case as purely administrative, but prior to closing, want to consult with you to confirm there is no applicable criminal violation that the DOJ is interested in pursuing at this time based on the facts below. As such, I'm sending this email to you. If you are not the appropriate AUSA to review, I apologize in advance; and, if you let me know who I could send it to, I will forward it accordingly.

Request: AUSA review for declination, if appropriate.

Issue(s)/Allegation(s): Did Administrator Pruitt's rental agreement with (b) (6), (b) (7)(C) constitute a gift?

Facts: The Office of Investigations (OI), Office of Inspector General, United States Environmental Protection Agency (EPA), received a memorandum, dated April 6, 2018, from the United States Office of Government Ethics. The memorandum brought forth allegations pertaining to matters affecting the EPA's Office of the Administrator, to which OI opened an administrative case to investigate ethical violations by Administrator Pruitt.

OI interviewed witnesses and reviewed records, which revealed the following, in sum:

Administrator Pruitt leased a condo located at (b) (6), (b) (7)(C) C Street NE, Washington, DC. Per the terms of the lease, Administrator Pruitt rented the condo from (b) (6), (b) (7)(C) C Street LLC (owned by (b) (6), (b) (7)(C)) for \$50.00 per day from February 20, 2017 to April 1, 2017. The lease limited Administrator Pruitt to the use of one bedroom of the unit. Other than verbally extending the terms of the lease, there were no changes to the lease.

Administrator Pruitt did not leave until August 4, 2017, despite (b) (6), (b) (7)(C) attempts to have him

leave. (b) (6), (b) (7)(C) stayed in the condo unit (b) (6), (b) (7)(C) use of a 2nd bedroom was not corroborated, but a witness stated that (b) (6), (b) (7)(C) stayed at the condo overnight multiple times). It was also revealed that Administrator Pruitt had unfettered access to the condo. Administrator Pruitt was allowed to and kept his personal belongings in the bedroom while he was not at the unit and could come and go as he pleased.

Administrator Pruitt paid \$6,100 total for his use of the condo, which equated to 122 days that he paid for the unit. The total number of days between February 20, 2017 and August 4, 2017 was 165 days. This discrepancy amounted to 43 days of which he had unfettered access to the condo unit for which he did not pay; and at \$50 per day, the discrepancy amounted to \$2,150.

Administrator Pruitt resigned from the EPA on July 5, 2018 while the investigation was ongoing; and at that time OI was investigating whether the rate of '\$50 per day' was "Market Value" as required in 5 Code of Federal Regulations (CFR) 2635, Subpart B, Sections 201 – 206. OI was also investigating "Impartiality" within the same Regulations.

Since Administrator Pruitt is no longer a Federal employee, it was unlikely that OI could interview him to obtain his statements pertaining to this matter. As such, OI could not complete the investigation as needed to be thorough; and thereby, find the allegation to be inconclusive.

Respectfully,

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

USEPA | Office of Inspector General | Office of Investigations | Office of Professional Responsibility
1200 Pennsylvania Avenue, NW | Mail Code 2431T | Washington, DC 20460

Desk: 202 (b) (6), (b) (7)(C) | Mobile: (b) (6), (b) (7)(C)

To report fraud, waste or abuse impacting EPA, please contact the EPA OIG Hotline via telephone numbers 202-566-2476 or 888-546-8740, fax 202-566-2599, or email at oig_hotline@epa.gov



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
INSPECTOR GENERAL

September 20, 2018

Via email: (b) (6), (b) (7)(C)
(b) (6), (b) (7)(C)

Washington, DC 20036

Dear (b) (6), (b) (7)(C)

Inspector General Elkins referred your letter dated September 7, 2018 to me for a response. As you note, your clients, (b) (6), (b) (7)(C) were interviewed by Office of Inspector General (OIG) agents regarding a matter involving the former Environmental Protection Agency Administrator, Scott Pruitt. Your letter requests the redaction of the names and personal information of the (b) (6), (b) (7)(C) and a week's notice prior to the publication of any report.

I can neither comment about whether the OIG may prepare a report in this case nor agree to provide notice to your clients. As to your clients' concerns about their privacy interests, if the OIG were to receive a request under the Freedom of Information Act (FOIA) for records relating to the subject matter, the OIG would follow and apply applicable FOIA exemptions to protect the personal privacy of your clients.

We appreciate (b) (6), (b) (7)(C) cooperation with our office. Should you have any questions about this, please do not hesitate to contact me at (202) (b) (6), (b) (7)(C)

Sincerely,

(b) (6), (b) (7)(C)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL
1301 CONSTITUTION AVE, NW
WASHINGTON, DC 20004

CASE #: OI-HQ-2018-ADM-0086

CROSS REFERENCE #: N/A

TITLE: Pruitt, E. Scott, Administrator, OA

INTERVIEWEE (if applicable): N/A

PREPARED BY: (b) (6), (b) (7)(C), Special Agent

MEMORANDUM OF ACTIVITY
CONSULTATION

NARRATIVE:

On August 14, 2018, at the direction of Arthur Elkins, Inspector General, Office of Inspector General (OIG), Environmental Protection Agency (EPA), (b) (6), (b) (7)(C) Office of Professional Responsibility, Office of Investigations, OIG, EPA, presented the facts of this investigation to Sonali Patel (Patel), Assistant United States Attorney (AUSA), United States Attorney's Office, District of Columbia, for consultation [Attachment 1].

The purpose of the consultation was to ensure that the United States Department of Justice identified no applicable criminal charges nor did they have any prosecutorial interest.

On August 17, 2018, (b) (6), (b) (7)(C) received an email from AUSA Patel informing (b) (6), (b) (7)(C) that his office has no prosecutorial interest in this investigation.

ATTACHMENT(S):

1. USAO Consultation & Declination Pruitt, E. Scott, Administrator, OA



USAO
Declination.Pruitt, E

CASE:
OI-HQ-2018-ADM-0086

DATE OF ACTIVITY:
August 14, 2018

INTERVIEWEE (if applicable):
N/A

DRAFTED DATE:
February 27, 2018

AGENT(S):
SA (b) (6), (b) (7)(C)

RESTRICTED INFORMATION
Page 1 of 1

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL
1301 CONSTITUTION AVE, NW
WASHINGTON, DC 20004

CASE #: OI-HQ-2018-CFD-0083

CROSS REFERENCE #: Case number

TITLE: Unknown Subject: Bribery

INTERVIEWEE (if applicable): N/A

PREPARED BY: (b) (6), (b) (7)(C)

MEMORANDUM OF ACTIVITY
EVIDENCE

NARRATIVE:

On January 31, 2019, Assistant Special Agent in Charge (ASAC) (b) (6), (b) (7)(C)

(b) (6), (b) (7)(C) United States Environmental Protection Agency (EPA), Washington, DC, provided (b) (6), (b) (7)(C)

EPA, Washington, DC, a thumb drive (SanDisk Cruzer Glide 128 GB Model #SDCZ60-128G Serial # BP10625507B) containing emails.

Continuing on January 31, 2019, the aforementioned thumb drive was destroyed by (b) (6), (b) (7)(C)

ASAC (b) (6), (b) (7)(C) completed EPA form 2720-6 – Evidence Custody (Attachment).

ATTACHMENT(S):

Evidence Custody - Destruction – Thumb Drive



Evidence Custody
Form - Thumb Drive

CASE:
OI-HQ-2018-CFD-0083

DATE OF ACTIVITY:
January 31, 2019

INTERVIEWEE (if applicable):
N/A

DRAFTED DATE:
January 31, 2019

AGENT(S):

(b) (6), (b) (7)(C)

RESTRICTED INFORMATION

Page 1 of 1

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.

From: (b) (6), (b) (7)(C)
To: (b) (6), (b) (7)(C)
Subject: FW: Follow up - Recusal Confirmed - Additional Recused cases and referral
Date: Thursday, January 31, 2019 2:46:04 PM

From: Elkins, Arthur
Sent: Friday, August 17, 2018 4:08 PM
To: (b) (6), (b) (7)(C) @epa.gov>
Cc: Larsen, Alan <Larsen.Alan@epa.gov>; Sheehan, Charles <Sheehan.Charles@epa.gov>; (b) (6), (b) (7)(C) @epa.gov>
Subject: Re: Follow up - Recusal Confirmed - Additional Recused cases and referral

Okay. Thank you.

Art

Sent from my iPhone

On Aug 17, 2018, at 4:06 PM, (b) (6), (b) (7)(C) @epa.gov> wrote:

Gentlemen,

Please see below. Operationally, I will take steps to finalize the turnover related to the recusal.

Best,

(b) (6), (b) (7)(C)

From: (b) (6), (b) (7)(C)
Sent: Friday, August 17, 2018 3:34 PM
To: (b) (6), (b) (7)(C) @usdoj.gov>; (b) (6), (b) (7)(C) @ic.fbi.gov>
Cc: (b) (6), (b) (7)(C) @epa.gov>
Subject: RE: Follow up - Recusal Confirmed - Additional Recused cases and referral

Gentlemen,

Good afternoon. (b) (6), (b) (7)(C) and I just met with the Inspector General regarding our conversation from last week. We briefed him on our discussion and recommendation related to the case recusal. He concurs. In addition, he desires to add the two additional OPR criminal cases into the scope of that recusal as they are sufficiently part of the set of issues related to the initial case being recused. To that end, I just spoke with (b) (6), (b) (7)(C) and I am referring these two additional cases to (b) (6), (b) (7)(C) for whatever additional

investigative activity deemed appropriate.

BREAK

(b) (6), (b) (7)(C)

I can have (b) (6), (b) (7)(E) coordinate with (b) (6), (b) (7)(E) to turnover what additional documentation we have on the two cases ((b) (7)(E) (OI-HQ-20180ADM-0124); (b) (7)(E) (OI-HQ-2018-CFD-0083)), for 0083, (b) (6), (b) (7)(E)

If you have any questions or concerns, please don't hesitate to contact me at 202- (b) (6), (b) (7)(E)

Best,

(b) (6), (b) (7)(C)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL
1301 CONSTITUTION AVENUE NW
WASHINGTON, DC 20004

DATE: March 14, 2019

PREPARED BY: SA (b) (6), (b) (7)(C)

CASE #: OI-HQ-2018-ADM-0039

CROSS REFERENCE

TITLE: Allegation of Inappropriate Lobbying

CASE CLOSING REPORT

| Subject(s) | Location | Other Data |
|------------|----------------|------------|
| NA | Washington, DC | |

VIOLATIONS:

31 U.S.C. § 1341 – Antideficiency Act

Public Law 115-31 – Consolidated Appropriations Act of 2017

ALLEGATION:

On September 26, 2017, the Committee on Energy and Commerce, U.S. House of Representatives requested that the EPA Office of Inspector General (OIG) “develop a comprehensive factual record for instances where possible violations of the Antideficiency Act and the publicity or propaganda and anti-lobbying provisions of the Consolidated Appropriations Act (CSA) of 2017, may have occurred, during an April 2017 meeting between former Administrator Scott Pruitt and the National Mining Association.”

FINDINGS:

The OIG’s Office of Investigations conducted seven interviews with members of the National Mining Association and five interviews with EPA personnel who attended the April 2017 meeting. As the purpose of this inquiry was to develop a factual record of said meeting, on March 1, 2019, a written account of the information collected was sent to the Committee on Energy and Commerce, U.S. House of Representatives.

RESTRICTED INFORMATION

Page 1

This report is the property of the Office of Investigations and is loaned to your agency: it and its contents may not be reproduced without written permission. The report is FOR OFFICIAL USE ONLY and its disclosure to unauthorized persons is prohibited. Public availability to be determined under 5 U.S.C. 552.

DISPOSITION:

This was a fact-finding matter. The matter was completed and the appropriate documents provided to Congress. No further action is required. As such, this matter is being closed.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
THE INSPECTOR GENERAL

MAR - 1 2019

The Honorable Frank Pallone Jr.
Chairman
Committee on Energy and Commerce
U.S. House of Representatives
Washington, D.C. 20515

Dear Chairman Pallone:

In a letter dated September 26, 2017, you informed me that on August 1, 2017, you sent a letter to the U.S. Government Accountability Office (GAO) "requesting a legal opinion on whether recent actions by Administrator Scott Pruitt violated the Antideficiency Act and the publicity or propaganda and anti-lobbying provisions of the Consolidated Appropriations Act (CSA) of 2017 during the time period before President Trump decided to pull the U.S. out of the Paris climate accord." You also stated that "prior to GAO conducting an analysis of whether recent actions by Administrator Pruitt violated the Antideficiency Act and the publicity or propaganda and anti-lobbying provisions of the CSA, it is necessary to establish a factual record." As a result, you requested that the U.S. Environmental Protection Agency's (EPA's) Office of Inspector General (OIG) "develop a comprehensive factual record for instances where possible legal violations may have occurred, including the April 2017 meeting between Administrator Pruitt and the National Mining Association."

On December 4, 2017, the OIG responded to your request by stating that after discussing our intended approach with your staff and officials of the GAO, the OIG would compile a factual record of the single meeting between EPA Administrator Pruitt and the National Mining Association in April 2017 and provide it to you. In turn, you may provide the OIG record to the GAO.

To that end, the OIG's Office of Investigations conducted seven interviews with members of the National Mining Association and five interviews with EPA personnel who attended the April 2017 meeting. Before agreeing to the interviews, members of the National Mining Association requested confidentiality; hence, all personally identifiable information was omitted from the written account of those interviews, which is enclosed.

We appreciate your interest in the work of the OIG. If you have additional questions about this or any other matter, please contact Jennifer Kaplan, Deputy Assistant Inspector General for Congressional and Public Affairs, at (202) 566-0918.

Sincerely,

A handwritten signature in blue ink that reads "Charles J. Sheehan".

Charles J. Sheehan
Acting Inspector General

Enclosures



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL**

1301 CONSTITUTION AVE, NW
WASHINGTON, DC 20004

CASE #: OI-HQ-2018-ADM-0039

CROSS REFERENCE #: NA

TITLE: Allegation of Inappropriate Lobbying

INTERVIEWEE (if applicable): NA

PREPARED BY: (b) (6), (b) (7)(C)

**MEMORANDUM OF ACTIVITY
OTHER**

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.

Attached Documents:

1. Memorandum of Interview (b) (6), (b) (7)(C)
2. Memorandum of Interview (b) (6), (b) (7)(C)
3. Memorandum of Interview (b) (6), (b) (7)(C)
4. Memorandum of Interview (b) (6), (b) (7)(C)
5. Memorandum of Interview (b) (6), (b) (7)(C)
6. Memorandum of Interview – NMA01
7. Memorandum of Interview – NMA02
8. Memorandum of Interview – NMA03
9. Memorandum of Interview – NMA04
10. Memorandum of Interview – NMA05
11. Memorandum of Interview – NMA06
12. Memorandum of Interview – NMA07

CASE: Allegation of
Inappropriate Lobbying
OI-HQ-2018-ADM-0039

DATE OF ACTIVITY:
January 31, 2019

INTERVIEWEE (if applicable):
NA

DRAFTED DATE:
January 31, 2019

AGENT(S):
(b) (6), (b) (7)(C)

RESTRICTED INFORMATION

Page 1 of 3

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.

1. Memorandum of Interview – (b) (6), (b) (7)(C)



(b) (6), (b) (7)(C)

2. Memorandum of Interview – (b) (6), (b) (7)(C)



(b) (6), (b) (7)(C)

3. Memorandum of Interview – (b) (6), (b) (7)(C)



(b) (6), (b) (7)(C)

4. Memorandum of Interview – (b) (6), (b) (7)(C)



(b) (6), (b) (7)(C)

5. Memorandum of Interview – (b) (6), (b) (7)(C)



(b) (6), (b) (7)(C)

6. Memorandum of Interview – NMA01



MOI NMA01.pdf

7. Memorandum of Interview – NMA02



MOI NMA02.pdf

8. Memorandum of Interview – NMA03

CASE: Allegation of
Inappropriate Lobbying

OI-HQ-2018-ADM-0039

DATE OF ACTIVITY:

January 31, 2019

RESTRICTED INFORMATION

Page 2 of 3

INTERVIEWEE (if applicable):

NA

DRAFTED DATE:

January 31, 2019

AGENT(S):

(b) (6), (b) (7)(C)

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.



MOI NMA03.pdf

9. Memorandum of Interview – NMA04



MOI NMA04.pdf

10. Memorandum of Interview – NMA05



MOI NMA05.pdf

11. Memorandum of Interview – NMA06



MOI NMA06.pdf

12. Memorandum of Interview – NMA07



MOI NMA07.pdf

CASE: Allegation of
Inappropriate Lobbying
OI-HQ-2018-ADM-0039
DATE OF ACTIVITY:
January 31, 2019

INTERVIEWEE (*if applicable*):
NA

DRAFTED DATE:
January 31, 2019

AGENT(S):

(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
Page 3 of 3

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL
1301 CONSTITUTION AVE, NW
WASHINGTON, DC 20004

CASE #: OI-HQ-2018-ADM-0039 CROSS REFERENCE #:

TITLE: ALLEGATION OF INAPPROPRIATE LOBBYING
INTERVIEWEE (if applicable): (b) (6), (b) (7)(C)

PREPARED BY: (b) (6), (b) (7)(C)

MEMORANDUM OF ACTIVITY
INTERVIEW

NARRATIVE:

On April 12, 2018, Special Agents (SA) (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) Office of Investigation (OI), Office of Inspector General (OIG), Environmental Protection Agency (EPA), conducted the interview of (b) (6), (b) (7)(C) EPA. The interview was in reference to a fact finding inquiry pursuant to a Congressional request to "develop a comprehensive factual record for instances where possible violations of the Antideficiency Act and the publicity or propaganda and anti-lobbying provisions of the Consolidated Appropriations Act (CSA) of 2017, may have occurred, during an April 2017 meeting between Administrator Pruitt and the National Mining Association."

Prior to commencing the interview, OIG agents introduced themselves to (b) (6), (b) (7) presented their EPA OIG law enforcement credentials for review, and explained the nature of the interview. (b) (6), (b) (7)(C) provided the following information in sum and non-verbatim:

(b) (6), (b) (7)(C)

CASE: OI-HQ-2018-ADM-0039

INTERVIEWEE (if applicable):

DATE OF ACTIVITY:
4/12/2018

DRAFTED DATE: 4/12/2018

AGENT:

(b) (6), (b) (7)(C)

RESTRICTED INFORMATION

Page 1 of 3

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.

Concerning (b) (6) presence at the National Mining Association meeting on April 24, 2017, (b) (6) explained that (b) (6) attended the meeting as (b) (6), (b) (7)(C) (b) (6) (b) (6) also said that Administrator Pruitt's speaking engagement lasted approximately 30 minutes. According to (b) (6), during this particular speaking engagement, Administrator Pruitt addressed an audience of nearly 200 people. According to (b) (6), (b) (6) did not hear the Administrator mention anything related to his support for the US to withdraw from the Paris Agreement on Climate Change.

When asked about whether (b) (6) attended the private meeting held between (b) (6), (b) (7)(C) the National Miners Association and Administrator Pruitt, (b) (6) said (b) (6), (b) (7)(C) (b) (6) was asked whether (b) (6) recalls anyone in the audience asking Administrator Pruitt about (b) (6) position concerning the US withdrawal from the Paris Agreement on Climate Change, (b) (6) stated the subject was not discussed. When asked to expand on what type of information was discussed at the meeting, (b) (6) responded that Administrator Pruitt discussed the EPA's goals, however, to the best of (b) (6) knowledge the Paris Agreement on Climate Change was not discussed. (b) (6) was also asked if (b) (6) had any knowledge as to (b) (6), (b) (7)(C) (b) (6) EPA wrote the speech.

When asked about the names of the EPA employees who attended the aforementioned meeting, (b) (6) stated that (b) (6), (b) (7)(C) (b) (6) were at the meeting. (b) (6), (b) (7)(C) (b) (6) was present during the speaking engagement. (b) (6) also said that (b) (6) would be able to provide the names (b) (6), (b) (7)(C) to SA (b) (6), (b) (6) via e-mail. SA (b) (6), (b) (6) asked (b) (6) whether (b) (6) knew the names of the National Miners Association (b) (6), (b) (7)(C) with whom Administrator Pruitt met with subsequent to the speaking engagement, to which (b) (6) responded that (b) (6) would provide SA (b) (6), (b) (7)(C) the names via e-mail. (b) (6)

SA (b) (6), (b) (6) asked (b) (6) the following specific questions:

On April 24, 2017, Mr. Pruitt attended a meeting with the National Miners Association in Naples Florida. During said meeting, did Mr. Pruitt suggest to the National Miners Association to support the US withdrawal from the Paris Climate Change Agreement?

(b) (6), response "no."
(b) (7)

CASE: OI-HQ-2018-ADM-
0039

INTERVIEWEE (if applicable):

DATE OF ACTIVITY:
4/12/2018

DRAFTED DATE: 4/12/2018

AGENT:
(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
Page 2 of 3

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.

Did you hear Mr. Pruitt ask any of the National Miners Association members to pressure the President into withdrawing from the Paris Climate Change Agreement?

(b) (6), (b) (7)(C) response "no."

During said meeting, did you suggest to the National Miners Association to support the US withdrawal from the Paris Climate Change Agreement?

(b) (6), (b) (7)(C) response "no."

Did you hear any EPA employee who attended said meeting suggest to the National Mining Association that they should support or pressure the President into withdrawing from the Paris Climate Change Agreement?

(b) (6), (b) (7)(C) response "no."

(b) (6), (b) (7)(C) sent SA (b) (6), (b) (7)(C) an e-mail message which contained the names of the PSD agents who attended the April 24, 2017 meeting between the National Mining Association and Administrator Pruitt [Attachment 1]. The e-mail also contained an attachment with the names of the National Mining Association (b) (6), (b) (7)(C) who met with Administrator Pruitt [Attachment 2].

Attachments:

1. E-mail message from (b) (6), (b) (7)(C) to SA (b) (6), (b) (7)(C) titled: (b) (6), (b) (7)(C)



2. National Mining Association (b) (6), (b) (7)(C) / Not dated.



CASE: OI-HQ-2018-ADM-0039

INTERVIEWEE (if applicable):

DATE OF ACTIVITY:
4/12/2018

DRAFTED DATE: 4/12/2018

AGENT:
(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
Page 3 of 3

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL
1301 CONSTITUTION AVE, NW
WASHINGTON, DC 20004

CASE #: 01-HQ-2018-ADM-0039 CROSS REFERENCE #:

TITLE: ALLEGATION OF INAPPROPRIATE LOBBYING

INTERVIEWEE (if applicable) (b) (6), (b) (7)(C)

PREPARED BY: (b) (6), (b) (7)(C)

MEMORANDUM OF ACTIVITY
INTERVIEW

NARRATIVE:

On April 17, 2018, Special Agents (SA) (b) (6), (b) (7)(C) Office of Investigation (OI) Environmental Protection Agency (EPA) and (b) (6), (b) (7)(C)

(b) (6), (b) (7)(C) Office of Investigation (OI), Office of Inspector General (OIG), Environmental Protection Agency (EPA), conducted the interview (b) (6), (b) (7)(C)

(b) (6), (b) (7)(C) EPA. The interview was conducted in reference to a fact finding inquiry pursuant to a Congressional request to "develop a comprehensive factual record for instances where possible violations of the Antideficiency Act and the publicity or propaganda and anti-lobbying provisions of the Consolidated Appropriations Act (CSA) of 2017, may have occurred, during an April 2017 meeting between Administrator Pruitt and the National Mining Association."

Prior to commencing the interview, OIG agents introduced themselves to (b) (6), (b) (7)(C) presented their EPA OIG law enforcement credentials for review, and explained the nature of the interview.

(b) (6), (b) (7)(C) provided the following information in sum and non-verbatim:

(b) (6), (b) (7)(C) accompanied EPA Administrator Scott Pruitt to a speaking engagement with the National Miners Association in Naples, FL. However,

CASE: 01-HQ-2018-ADM-0039

INTERVIEWEE (if applicable):

DATE OF ACTIVITY:
4/17/2018

DRAFTED DATE: 4/18/2018

AGENT:

(b) (6), (b) (7)(C)

RESTRICTED INFORMATION

Page 1 of 2

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.

(b) only recalls working with (b) (6), (b) (7)(C), EPA. (b) stated that even though (b) was present at the meeting the Administrator had with the National Mining Association, (b) does not recall Administrator Pruitt or anyone else discussing the Paris Climate Change Agreement.

(b) concluded by stating that (b) does not remember much of what was said by Administrator Pruitt during said meeting, however, (b) does remember that members of the press did not attend the meeting.

Prior to terminating the interview, (b) was asked the following questions:

On April 24, 2017, Mr. Pruitt attended a meeting with the National Miners Association in Naples Florida. During said meeting, did Mr. Pruitt suggest to the National Miners Association to support the US withdrawal from the Paris Climate Change Agreement?

(b) response "no, I don't remember Pruitt meeting separately with (b) (6), (b) (7)(C) "

Did you hear Mr. Pruitt ask any of the National Miners Association members to pressure the President into withdrawing from the Paris Climate Change Agreement?

(b) response "I don't recall."

During said meeting, did you suggest to the National Miners Association to support the US withdrawal from the Paris Climate Change Agreement?

(b) response "no."

Did you hear any EPA employee who attended said meeting suggest to the National Mining Association that they should support or pressure the President into withdrawing from the Paris Climate Change Agreement?

(b) response "no."

As (b) had no further pertinent information the interview was concluded.

CASE: OI-HQ-2018-ADM-0039

INTERVIEWEE (if applicable):

DATE OF ACTIVITY:
4/17/2018

DRAFTED DATE: 4/18/2018

AGENT:
(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
Page 2 of 2

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL**

1301 CONSTITUTION AVE, NW
WASHINGTON, DC 20004

CASE #: 01-HQ-2018-ADM-0039 **CROSS REFERENCE #:**

TITLE: ALLEGATION OF INAPPROPRIATE LOBBYING

INTERVIEWEE (if applicable): (b) (6), (b) (7)(C)

PREPARED BY: (b) (6), (b) (7)(C)

**MEMORANDUM OF ACTIVITY
INTERVIEW**

NARRATIVE:

On April 12, 2018, Special Agents (SA) (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) Office of Inspector General (OIG), Environmental Protection Agency (EPA) and (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) OI, OIG, EPA, conducted the interview of (b) (6), (b) (7)(C), EPA. The interview was in reference to a fact finding inquiry pursuant to a Congressional request to "develop a comprehensive factual record for instances where possible violations of the Antideficiency Act and the publicity or propaganda and anti-lobbying provisions of the Consolidated Appropriations Act (CSA) of 2017, may have occurred, during an April 2017 meeting between Administrator Pruitt and the National Mining Association."

Prior to commencing the interview, OIG agents introduced themselves to (b) (6), (b) (7)(C) presented their EPA OIG law enforcement credentials for review, and explained the nature of the interview. (b) (6), (b) (7) provided the following information in sum and non-verbatim:

(b) (6), (b) (7)(C)

CASE: 01-HQ-2018-ADM-
0039

INTERVIEWEE (if applicable):

DATE OF ACTIVITY:
4/12/2018

DRAFTED DATE: 4/13/2018

AGENT:
(b) (6), (b) (7)(C)

RESTRICTED INFORMATION

Page 1 of 3

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.

(b) (6), (b) (7)(C)

When asked about if (b) (6) attended Administrator Pruitt's meeting with the National Miners Association in Naples, FL on April 24, 2017, (b) (6), (b) (7)(C) responded, "yes, I was there for the majority of the meeting, but briefly stepped out." When asked about how long the meeting lasted, (b) (6), (b) (7)(C) said "about 45 minutes." (b) (6), (b) (7)(C) was asked if Administrator Pruitt met with (b) (6), (b) (7)(C) from the National Mining Association prior to the speaking engagement, to which (b) (6), (b) (7)(C) responded that there was no pre-meeting.

When asked if Administrator Pruitt discussed anything related to the US withdrawal from the Paris Agreement on Climate Change, (b) (6), (b) (7)(C) stated not to know for sure if anything was mentioned about the topic. When asked if (b) (6), (b) (7)(C) recalls what Administrator Pruitt's speech was about, (b) (6), (b) (7)(C)

(b) (6), (b) (7)(C) Administrator Pruitt talked about "returning the agency to its core mission, process and cooperation." (b) (6), (b) (7)(C) added that (b) (6), (b) (7)(C) does not know for sure if Administrator Pruitt mentioned anything about the Paris Agreement on Climate Change.

As the interview progressed, (b) (6), (b) (7)(C) was asked again if Administrator Pruitt met with (b) (6), (b) (7)(C) from the National Mining Association separate from the speaking engagement, at which point (b) (6), (b) (7)(C) recalled that there was a post-meeting between Administrator Pruitt and (b) (6), (b) (7)(C) from the National Mining Association, and that this meeting was attended by a group (b) (6), (b) (7)(C) from the National Mining Association. When asked (b) (6), (b) (7)(C) knows the names of the attendees, (b) (6), (b) (7)(C) said, the only name he recalls is (b) (6), (b) (7)(C) and added that (b) (6), (b) (7)(C) EPA would know the rest of the names. (b) (6), (b) (7)(C) also said that (b) (6), (b) (7)(C) at the EPA was present for the meeting, as well as (b) (6), (b) (7)(C). When asked if during the private meeting Administrator Pruitt had with (b) (6), (b) (7)(C) the National Mining Association he mentioned anything about the Paris Climate Change Agreement, (b) (6), (b) (7)(C) responded that the topic was briefly discussed, however, Administrator Pruitt limited himself to explaining his position on the topic. According to (b) (6), (b) (7)(C) "there was no call" from Administrator Pruitt to the miners to pressure the president into withdrawing from the Paris Agreement on Climate Change. When asked to expand on what exactly Administrator Pruitt said his position was concerning the US withdrawal from the Paris Agreement on Climate Change, (b) (6), (b) (7)(C) said, "the Administrator's position is that withdrawing is a good thing." According to

CASE: 01-HQ-2018-ADM-0039

INTERVIEWEE (if applicable):

DATE OF ACTIVITY:
4/12/2018

DRAFTED DATE: 4/13/2018

AGENT:

(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
Page 2 of 3

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.

(b) (6), (b) (7)(C) Administrator Pruitt believes "it was an unfair deal for our country" and that "the President did the right thing." (b) (6), (b) (7)(C) uttered, "this is what he says now." (b) (6), (b) (7)(C) later said that (b) (6), (b) (7)(C) does not recall if that is exactly what Administrator Pruitt said during the meeting with the miners.

SA (b) (6), (b) (7)(C) asked (b) (6), (b) (7)(C) the following specific questions:

On April 24, 2017, Mr. Pruitt attended a meeting with the National Miners Association in Naples Florida. During said meeting, did Mr. Pruitt suggest to the National Miners Association to support the US withdrawal from the Paris Climate Change Agreement?

(b) (6), (b) (7)(C) response "Not to my recollection."

Did you hear Mr. Pruitt ask any of the National Miners Association members to pressure the President into withdrawing from the Paris Climate Change Agreement?

(b) (6), (b) (7)(C) response "no."

During said meeting, did you suggest to the National Miners Association to support the US withdrawal from the Paris Climate Change Agreement?

(b) (6), (b) (7)(C) response "no."

Did you hear any EPA employee who attended said meeting to suggest to the National Mining Association that they should support or pressure the President into withdrawing from the Paris Climate Change Agreement?

(b) (6), (b) (7)(C) response "no."

As (b) (6), (b) (7)(C) had not further information to share the interview was concluded.

CASE: 01-HQ-2018-ADM-0039

INTERVIEWEE (if applicable):

DATE OF ACTIVITY:
4/12/2018

DRAFTED DATE: 4/13/2018

AGENT:

(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
Page 3 of 3

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL
61 FORSYTH STREET, SW
ATLANTA, GA 30303

CASE #: OI-HQ-2018-ADM-0039

CROSS REFERENCE #:

TITLE: ALLEGATION OF INAPPROPRIATE LOBBYING

INTERVIEWEE: (b) (6), (b) (7)(C) EPA: (b) (6), (b) (7)(C)

PREPARED BY: (b) (6), (b) (7)(C)

MEMORANDUM OF ACTIVITY
INTERVIEW

NARRATIVE:

On May 21, 2018, SA (b) (6), (b) (7)(C) contacted (b) (6), (b) (7)(C)

(b) (6), (b) (7)(C) to schedule an interview regarding an allegation of possible Antideficiency Act and Consolidated Appropriations Act of 2017 violations committed by EPA Administrator Scott Pruitt during an April 2017 meeting with the National Mining Association. When informed of the purpose of the interview, (b) (6), (b) (7)(C) stated that (b) (6), (b) (7)(C) was not present at this meeting. (b) (6), (b) (7)(C) reported the following:

(b) (6), (b) (7)(C) During this trip, Pruitt was scheduled to meet with the National Mining Association. (b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

CASE #:
OI-HQ-2018-ADM-0039

INTERVIEWEE (if applicable):

(b) (6), (b) (7)(C)

DATE OF ACTIVITY:
05/21/18

DRAFTED DATE:
05/21/18

AGENT(S):
(b) (6), (b) (7)(C)

RESTRICTED INFORMATION

Page 1 of 2

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.

(b) (6), (b) (7)(C)

but was too far away to overhear any of their conversations.

CASE #:
OI-HQ-2018-ADM-0039

INTERVIEWEE (if applicable):
(b) (6), (b) (7)(C)

DATE OF ACTIVITY:
05/21/18

DRAFTED DATE:
05/21/18

AGENT(S):
(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
Page 2 of 2

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL**

1301 CONSTITUTION AVE, NW
WASHINGTON, DC 20004

CASE #: OI-HQ-2018-ADM-0039

CROSS REFERENCE #:

TITLE: Allegation of Inappropriate Lobbying

INTERVIEWEE (if applicable): (b) (6), (b) (7)(C)

PREPARED BY: SA (b) (6), (b) (7)(C)

**MEMORANDUM OF ACTIVITY
INTERVIEW**

NARRATIVE:

On April 26, 2018, Special Agents (SA) (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C), (b) (6), (b) (7)(C) Office of Investigation (OI), Office of Inspector General (OIG), Environmental Protection Agency (EPA), conducted an interview of (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) EPA. The interview was conducted in reference to a fact-finding inquiry pursuant to a Congressional request to "develop a comprehensive factual record for instances where possible violations of the Antideficiency Act and the publicity or propaganda and anti-lobbying provisions of the Consolidated Appropriations Act (CSA) of 2017, may have occurred, during an April 2017 meeting between Administrator Pruitt and the National Mining Association."

Prior to commencing the interview, OIG agents introduced themselves to (b) (6), (b) (7)(C) presented their EPA OIG law enforcement credentials for review, and explained the nature of the interview. (b) (6), (b) (7)(C) provided the following information in summary and non-verbatim:

(b) (6), (b) (7)(C) stated that (b) (6), (b) (7)(C) accompanied Administrator Pruitt to the meeting with the National Mining Association (NMA). According to (b) (6), (b) (7)(C), Administrator Pruitt gave a speech to the attendees; however, (b) (6), (b) (7)(C) does not remember him mentioning the Paris Climate Change

CASE:
OI-HQ-2018-ADM-0039
DATE OF ACTIVITY:
April 26, 2018

INTERVIEWEE (if applicable):
(b) (6), (b) (7)(C)
DRAFTED DATE:
April 30, 2018

AGENT(S):
(b) (6), (b) (7)(C)
(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
Page 1 of 2

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.

Agreement. (b) (6), (b) (7)(C) added that the meeting with the NMA was a closed event and no media was present. (b) (6), (b) (7)(C) did not provide additional information concerning the matter under review.

Prior to terminating the interview, (b) (6), (b) (7) was asked the following questions:

On April 24, 2017, Mr. Pruitt attended a meeting with the National Miners Association in Naples Florida. During said meeting, did Mr. Pruitt suggest to the National Miners Association to support the US withdrawal from the Paris Climate Change Agreement?

(b) (6), (b) (7)(C) response "no."

Did you hear Mr. Pruitt ask any of the National Miners Association members to pressure the President into withdrawing from the Paris Climate Change Agreement?

(b) (6), (b) (7)(C) response "no."

During said meeting, did you suggest to the National Miners Association to support the US withdrawal from the Paris Climate Change Agreement?

(b) (6), (b) (7)(C) response "no."

Did you hear any EPA employee who attended said meeting to suggest to the National Mining Association that they should support or pressure the President into withdrawing from the Paris Climate Change Agreement?

(b) (6), (b) (7)(C) response "no."

As (b) (6), (b) (7) had no further pertinent information the interview was concluded.

CASE:
OI-HQ-2018-ADM-0039
DATE OF ACTIVITY:
April 26, 2018

INTERVIEWEE (if applicable):
(b) (6), (b) (7)
DRAFTED DATE:
April 30, 2018

AGENT(S):
(b) (6), (b) (7)
(b) (6), (b) (7)

RESTRICTED INFORMATION
Page 2 of 2

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL
1301 CONSTITUTION AVE, NW
WASHINGTON, DC 20004

CASE #: OI-HQ-2018-ADM-0039 CROSS REFERENCE #:

TITLE: ALLEGATION OF INAPPROPRIATE LOBBYING

INTERVIEWEE (if applicable): NMA01

PREPARED BY: (b) (6), (b) (7)(C)

MEMORANDUM OF ACTIVITY
INTERVIEW

NARRATIVE:

To comply with the confidentiality agreement made between (b) (6), (b) (7)(C) representing the National Mining Association (NMA) (b) (6), (b) (7)(C) and EPA Office of Inspector General, except for (b) (6), (b) (7)(C) and the OIG Special Agents who conducted the interview, the names of all other participants are omitted from this report.

On August 13, 2018, Special Agent (SA) (b) (6), (b) (7)(C) Office of Investigations (OI), Office of Inspector General (OIG), Environmental Protection Agency (EPA), and SA (b) (6), (b) (7)(C) (OI), (OIG), (EPA), telephonically interviewed NMA01. The interview was conducted in reference to a fact-finding inquiry pursuant to a Congressional request to "develop a comprehensive factual record for instances where possible violations of the Antideficiency Act and the publicity or propaganda and anti-lobbying provisions of the Consolidated Appropriations Act (CSA) of 2017, may have occurred, during an April 2017 meeting between former Administrator Pruitt and the National Mining Association (NMA)."

Present for the interview were (b) (6), (b) (7)(C) and another NMA attorney.

CASE: OI-HQ-2018-ADM-0039

INTERVIEWEE (if applicable):

DATE OF ACTIVITY:
8/16/2018

DRAFTED DATE: 8/21/2018

AGENT:

(b) (6), (b) (7)(C)

RESTRICTED INFORMATION

Page 1 of 2

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.

Prior to commencing the interview SA (b) (6), (b) (7) restated the purpose of the interview. NMA01 was asked a total of 10 questions. [See attachment 1]. The following is a non-verbatim account of the responses provided by NMA01.

During the initial stages of the interview, NMA01 confirmed (b) (6), (b) (7)(C) with the NMA. NMA01 stated (b) (6) attended the meeting with former Administrator Pruitt, and recalls that Pruitt's speech consisted of discussing issues related to the environment and environmental regulations. According to NMA01, (b) (6) has no recollection of Pruitt discussing the Paris climate accord, and added that neither Pruitt nor any other EPA employee mentioned anything related to the Paris climate accord. NMA01 also said that no one asked (b) (6) to publicly support the US withdrawal from the Paris climate accord. NMA01 reiterated (b) (6) has no recollection of Pruitt discussing the Paris accord during the meeting, and added that Pruitt only spoke about the regulatory issues affecting the US.

NMA01 stated that the proposal to vote on whether or not to support the US withdrawal from the Paris climate accord was made by (b) (6), (b) (7)(C) and decided day after the (b) (6), (b) (7)(C) met with former Administrator Pruitt. According to NMA01, some (b) (6), (b) (7)(C) expressed the Paris accord was not a good policy for the coal industry.

Attachment:

1. Interview questions/Undated



CASE: OI-HQ-2018-ADM-0039

INTERVIEWEE (if applicable):

DATE OF ACTIVITY:
8/16/2018

DRAFTED DATE: 8/21/2018

AGENT:

(b) (6), (b) (7)(C)

RESTRICTED INFORMATION

Page 2 of 2

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL**

1301 CONSTITUTION AVE, NW
WASHINGTON, DC 20004

CASE #: 01-HQ-2018-ADM-0039 **CROSS REFERENCE #:**

TITLE: ALLEGATION OF INAPPROPRIATE LOBBYING

INTERVIEWEE (if applicable): NMA02

PREPARED BY: (b) (6), (b) (7)(C)

**MEMORANDUM OF ACTIVITY
INTERVIEW**

NARRATIVE:

To comply with the confidentiality agreement made between (b) (6), (b) (7)(C) representing the National Mining Association (NMA) (b) (6), (b) (7)(C), and the EPA Office of Inspector General, except for (b) (6), (b) (7)(C) and the OIG Special Agents who conducted the interview, the names of all other participants are omitted from this report.

On August 2, 2018, Special Agents (SA) (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) Office of Investigations (OI), Office of Inspector General (OIG), Environmental Protection Agency (EPA), conducted the telephonic interview of NMA02. The interview was conducted in reference to a fact-finding inquiry pursuant to a Congressional request to "develop a comprehensive factual record for instances where possible violations of the Antideficiency Act and the publicity or propaganda and anti-lobbying provisions of the Consolidated Appropriations Act (CSA) of 2017, may have occurred, during an April 2017 meeting between former Administrator Pruitt and the National Mining Association (NMA)."

Present for the interview were: (b) (6), (b) (7)(C) and an executive from NMA02's organization.

CASE: 01-HQ-2018-ADM-0039

INTERVIEWEE (if applicable):

DATE OF ACTIVITY:
8/2/2018

DRAFTED DATE: 8/2/2018

AGENT:

(b) (6), (b) (7)(C)

RESTRICTED INFORMATION

Page 1 of 3

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.

Prior to commencing the interview SA (b) (6), (b) (7)(C) restated the purpose of the interview. NMA02 was asked a total of 10 questions. [See attachment 1]. The following is a non-verbatim account of the responses provided by NMA02.

(b) (6), (b) (7)(C) was present during the speaking engagement and subsequent meeting between former Administrator Pruitt and the NMA (b) (6), (b) (7)(C). NMA02 stated that during the speaking engagement and private meeting, former Administrator Pruitt mentioned the Paris climate accord along the lines that the EPA was deregulating. NMA02 reported that former Administrator Pruitt also said that "the U.S. should withdraw from the Paris accord," and added that (b) (6), (b) (7)(C) recalls former Administrator Pruitt said that the Paris accord is unfair and that "the U.S. should withdraw."

NMA02 said that neither former Administrator Pruitt nor any member of Pruitt's staff urged (b) (6), (b) (7)(C) to publicly support the U.S. withdrawal from the Paris climate accord. NMA02 stated (b) (6), (b) (7)(C) was not urged by former Administrator Pruitt to pressure President Trump to withdraw from the Paris climate accord. NMA02 reiterated that former Administrator Pruitt did not ask (b) (6), (b) (7)(C) to pressure President Trump to withdraw from the Paris climate accord.

According to NMA02, arrangements to convene a meeting to vote on whether or not to support the U.S. withdrawal from the Paris climate accord were made before (b) (6), (b) (7)(C) met with former Administrator Pruitt; therefore, said meeting or the decisions made by (b) (6), (b) (7)(C) in said meeting were not influenced by former Administrator Pruitt's meeting with the NAM (b) (6), (b) (7)(C). NMA02 added that (b) (6), (b) (7)(C) "would not be able to say with any degree of certainty that (b) (6), (b) (7)(C) were influenced by the conversation with Pruitt. To say so would be speculation."

As NMA02 had not further information to share, the interview was concluded.

Attachment:

1. Interview questions/Undated



CASE: OI-HQ-2018-ADM-0039

INTERVIEWEE (if applicable):

DATE OF ACTIVITY:
8/2/2018

DRAFTED DATE: 8/2/2018

AGENT:

(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
Page 2 of 3

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.

CASE: OI-HQ-2018-ADM-
0039

INTERVIEWEE *(if applicable):*

DATE OF ACTIVITY:
8/2/2018

DRAFTED DATE: 8/2/2018

AGENT:
(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
Page 3 of 3

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL**

1301 CONSTITUTION AVE, NW
WASHINGTON, DC 20004

CASE #: 01-HQ-2018-ADM-0039 **CROSS REFERENCE #:**

TITLE: ALLEGATION OF INAPPROPRIATE LOBBYING

INTERVIEWEE (if applicable): NMA03

PREPARED BY: (b) (6), (b) (7)(C)

**MEMORANDUM OF ACTIVITY
INTERVIEW**

NARRATIVE:

To comply with the confidentiality agreement made between M (b) (6), (b) (7)(C) representing the National Mining Association (NMA) (b) (6), (b) (7)(C), and the EPA Office of Inspector General, except for (b) (6), (b) (7)(C) and the OIG Special Agents who conducted the interview, the names of all other participants are omitted from this report.

On August 15, 2018, Special Agents (SA) (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) Office of Investigations (OI), Office of Inspector General (OIG), Environmental Protection Agency (EPA), conducted the telephonic interview of NMA03. The interview was conducted about a fact-finding inquiry pursuant to a Congressional request to "develop a comprehensive factual record for instances where possible violations of the Antideficiency Act and the publicity or propaganda and anti-lobbying provisions of the Consolidated Appropriations Act (CSA) of 2017, may have occurred, during an April 2017 meeting between former Administrator Pruitt and the National Mining Association (NMA)."

Present for the interview were: (b) (6), (b) (7)(C) another NAM attorney, NMA03, and NMA's corporate counsel.

CASE: 01-HQ-2018-ADM-0039

INTERVIEWEE (if applicable):
NMA03

DATE OF ACTIVITY:
8/15/2018

DRAFTED DATE:
8/16/2018

AGENT:
(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
Page 1 of 2

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.

Prior to commencing the interview SA (b) (6), (b) (7)(C) reiterated the purpose of the interview. NMA03 was asked a total of 10 questions. [See attachment 1]. The following is the non-verbatim account of the responses NAM03 provided to the questions.

During the initial stages of the interview, NMA03 confirmed (b) (6), (b) (7)(C) NMA03 explained (b) (6), (b) (7)(C) and nothing was mentioned about the Paris Accord. (b) (6), (b) (7)(C). When asked if (b) (6), (b) (7)(C) was pressured by Pruitt or any other EPA employee to support the US withdrawal from the Paris Accord, NMA03 replied, "I don't recall that." NMA03 further stated that no one asked (b) (6), (b) (7)(C) to pressure President Trump to withdraw from the Paris Accord. (b) (6), (b) (7)(C)

About whether the meeting with Pruitt influenced (b) (6), (b) (7)(C) personal or organizational (b) (6), (b) (7)(C) decision to withdraw from the Paris Accord, NMA03 said that (b) (6), (b) (7)(C) when the members decided to vote on whether to express support for the US withdrawal from the Paris Accord. NMA03 added that (b) (6), (b) (7)(C) company did not support the US withdrawal from the Paris Accord, and further stated that (b) (6), (b) (7)(C) said to (b) (6), (b) (7)(C) that one of the (b) (6), (b) (7)(C) was "pushing" for the vote to support the withdrawal. NMA03 concluded by stating that because (b) (6), (b) (7)(C) company did not support the US withdrawal from the Paris Climate Accord, (b) (6), (b) (7)(C) could not say that the NMA's decision to support the withdrawal was influenced by Pruitt. (b) (6), (b) (7)(C)

Attachment:

1. Interview questions/Undated



CASE: O1-HQ-2018-ADM-0039

INTERVIEWEE (if applicable):
NMA03

DATE OF ACTIVITY:
8/15/2018

DRAFTED DATE:
8/16/2018

AGENT:

(b) (6), (b) (7)(C)

RESTRICTED INFORMATION

Page 2 of 2

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL
1301 CONSTITUTION AVE, NW
WASHINGTON, DC 20004

CASE #: OI-HQ-2018-ADM-0039 **CROSS REFERENCE #:**

TITLE: ALLEGATION OF INAPPROPRIATE LOBBYING

INTERVIEWEE (if applicable): NMA04

PREPARED BY: (b) (6), (b) (7)(C)

MEMORANDUM OF ACTIVITY
INTERVIEW

NARRATIVE:

To comply with the confidentiality agreement made between (b) (6), (b) (7)(C), representing the National Mining Association (NMA) (b) (6), (b) (7)(C), and the EPA Office of Inspector General, except for (b) (6), (b) (7)(C) and the OIG Special Agents who conducted the interview, the names of all other participants are omitted from this report.

On August 16, 2018, Special Agents (SA) (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) Office of Inspector General (OIG), Environmental Protection Agency (EPA) and (b) (6), (b) (7)(C) OI, OIG, EPA, conducted the telephonic interview of NMA04. The interview was conducted in reference to a fact-finding inquiry pursuant to a Congressional request to "develop a comprehensive factual record for instances where possible violations of the Antideficiency Act and the publicity or propaganda and anti-lobbying provisions of the Consolidated Appropriations Act (CSA) of 2017, may have occurred, during an April 2017 meeting between former Administrator Pruitt and the National Mining Association (NMA)."

CASE:
OI-HQ-2018-ADM-0039

INTERVIEWEE (if applicable):
NMA04

DATE OF ACTIVITY:
8/16/2018

DRAFTED DATE:
8/23/2018

AGENT:
(b) (6), (b) (7)(C)

RESTRICTED INFORMATION

Page 1 of 2

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.

Present for the interview were (b) (6), (b) (7)(C), a second NMA attorney, NMA04 and a corporate attorney representing NMA04.

Prior to commencing the interview SA (b) (6), (b) (7)(C) restated the purpose of the interview. NMA04 was asked a total of 10 questions. [See attachment 1]. The following is a non-verbatim account of the responses provided by NMA04.

NMA04 confirmed (b) (6), (b) (7)(C) association with the NMA (b) (6), (b) (7)(C) and stated (b) (6), (b) (7)(C) attended the speaking engagement with former Administrator Pruitt on April 24, 2017. Regarding (b) (6), (b) (7)(C) recollection of whether former Administrator Pruitt discussed the Paris Climate Accord, NMA04 said "I don't think he did." NMA04 added that what (b) (6), (b) (7)(C) recalls about former Administrator Pruitt is that he was focused on the EPA's priorities and regulations, such as rolling back some of the EPA laws.

According to NMA04, neither former Administrator Pruitt nor any members of Pruitt's cabinet urged (b) (6), (b) (7)(C) to publicly support the U.S. withdrawal from the Paris Climate Accord. NMA04 also stated that former Administrator Pruitt did not ask (b) (6), (b) (7)(C) to pressure President Trump to withdraw from the Paris Climate Accord. NMA04 stated that (b) (6), (b) (7)(C) the meeting with former Administrator Pruitt had no impact on (b) (6), (b) (7)(C) personal or organizational decision to send a letter to President Trump expressing support of the U.S. withdrawal from the Paris Climate Accord.

As NMA04 had not further information to share, the interview was concluded.

Attachment:

1. Interview questions/Undated



CASE:
OI-HQ-2018-ADM-0039

INTERVIEWEE (if applicable):
NMA04

DATE OF ACTIVITY:
8/16/2018

DRAFTED DATE:
8/23/2018

AGENT:
(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
Page 2 of 2

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL
1301 CONSTITUTION AVE, NW
WASHINGTON, DC 20004

CASE #: 01-HQ-2018-ADM-0039 CROSS REFERENCE #:

TITLE: ALLEGATION OF INAPPROPRIATE LOBBYING

INTERVIEWEE (if applicable): NMA05

PREPARED BY: (b) (6), (b) (7)(C)

MEMORANDUM OF ACTIVITY
INTERVIEW

NARRATIVE:

To comply with the confidentiality agreement made between (b) (6), (b) (7)(C) representing the National Mining Association (NMA) (b) (6), (b) (7)(C), and the EPA Office of Inspector General, except for (b) (6), (b) (7)(C) and the OIG Special Agents who conducted the interview, the names of all other participants are omitted from this report.

On August 29, 2018, Special Agent (SA) (b) (6), (b) (7)(C) Office of Investigations (OI), Office of Inspector General (OIG), Environmental Protection Agency (EPA), conducted the telephonic interview of NMA05. The interview was conducted in reference to a fact-finding inquiry pursuant to a Congressional request to "develop a comprehensive factual record for instances where possible violations of the Antideficiency Act and the publicity or propaganda and anti-lobbying provisions of the Consolidated Appropriations Act (CSA) of 2017, may have occurred, during an April 2017 meeting between former Administrator Pruitt and the National Mining Association (NMA)."

Present for the interview were: (b) (6), (b) (7)(C) a second NMA attorney, NMA05 and a corporate attorney representing NMA05.

CASE:
01-HQ-2018-ADM-0039

INTERVIEWEE (if applicable):
NMA05

DATE OF ACTIVITY:
8/29/2018

DRAFTED DATE:
8/31/2018

AGENT:
(b) (6), (b) (7)(C)

RESTRICTED INFORMATION

Page 1 of 2

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.

Prior to commencing the interview SA (b) (6), (b) (7) reiterated the purpose of the interview. NMA05 was asked a total of 10 questions. [See attachment 1]. The following is a non-verbatim account of the responses provided by NMA05 to the interview questions.

NMA05 explained that (b) (6), (b) (7)(C); consequently, (b) represents said company before the NMA. Concerning the meeting between former Administrator Pruitt and the NMA (b) (6), (b) (7)(C), NMA05 stated (b) attended the meeting with former Administrator Pruitt, and recalls Pruitt mentioning that the Paris Climate Accord was under review by the Trump administration. NMA05 also said that former Administrator Pruitt's speech was broad and that he mentioned something about deregulation and job creation.

According to NMA05, neither Pruitt nor anyone from Pruitt's staff requested of (b) (6), (b) (7)(C) or any other NMA (b) (6), (b) (7)(C) to publicly criticize the Paris Accord. NMA05 also said that (b) was not asked to pressure President Trump to withdraw from the Paris Accord. About the letter the NMA sent to President Trump expressing the organization's support of the U.S. withdrawal from the Paris Accord, NMA05 stated (b) (6), (b) (7)(C) when the voting decision was made by the NMA (b) (6), (b) (7)(C); however, the company (b) represents opposed the U.S. withdrawal from the Paris Accord. (6)

Since NMA05 had no further information concerning the matter under investigation, the interview was concluded.

Attachment:

1. Interview questions/Undated



CASE:
OI-HQ-2018-ADM-0039

INTERVIEWEE (if applicable):
NMA05

DATE OF ACTIVITY:
8/29/2018

DRAFTED DATE:
8/31/2018

AGENT:
(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
Page 2 of 2

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL
1301 CONSTITUTION AVE, NW
WASHINGTON, DC 20004

CASE #: 01-HQ-2018-ADM-0039 **CROSS REFERENCE #:**

TITLE: ALLEGATION OF INAPPROPRIATE LOBBYING

INTERVIEWEE (if applicable): NMA06

PREPARED BY: (b) (6), (b) (7)(C)

MEMORANDUM OF ACTIVITY
INTERVIEW

NARRATIVE:

On August 16, 2018, Special Agents (SA) (b) (6), (b) (7)(C) Office of Investigations (OI), Office of Inspector General (OIG), Environmental Protection Agency (EPA), conducted the telephonic interview of NMA06. The interview was conducted in reference to a fact-finding inquiry pursuant to a Congressional request to "develop a comprehensive factual record for instances where possible violations of the Antideficiency Act and the publicity or propaganda and anti-lobbying provisions of the Consolidated Appropriations Act (CSA) of 2017, may have occurred, during an April 2017 meeting between former Administrator Pruitt and the National Mining Association (NMA)."

Present for the interview were: (b) (6), (b) (7)(C) and a second NMA attorney.

Prior to commencing the interview SA (b) (6), (b) (7)(C) reiterated the purpose of the interview. NMA06 was asked a total of 10 questions. [See attachment 1]. The following is a non-verbatim account of the responses NMA06 provided to the questions.

CASE:
01-HQ-2018-ADM-0039

INTERVIEWEE (if applicable):
(b) (6), (b) (7)(C)

DATE OF ACTIVITY:
8/16/2018

DRAFTED DATE:
8/21/2018

AGENT:
(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
Page 1 of 2

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.

NMA06 stated (b) attended the speaking engagement with former Administrator Pruitt, (b) (6), (b) (7)(C) NMA06 stated, that during the speaking engagement, Pruitt mentioned the Paris Climate agreement, in specific that the Paris agreement did not serve the interest of the country.

About whether former Administrator Pruitt urged (b) (6), (b) (7)(C) or any of the attending (b) (6), (b) (7)(C) to publicly support the U.S. withdrawal from the Paris Climate agreement, NMA06 stated (b) did not hear Pruitt ask for the organization or anyone to take any action concerning the Paris agreement. NMA06 also said that no one from Pruitt's staff asked (b) (6), (b) (7)(C) to publicly criticize the Paris Climate agreement to pressure Mr. Trump to withdraw.

In discussing the private meeting that former Administrator Pruitt had (b) (6), (b) (7)(C) NMA06 stated that during that particular meeting, (b) did not hear anything from former Administrator Pruitt that could be construed as him asking (b) the NMA to take any action about the Paris Climate Accord. NMA06 added that (b) did not hear former Administrator Pruitt asking (b) nor anyone else to pressure President Trump to withdraw from the Paris Accord. Concerning the letter the NMA sent to President Trump in support of the U.S. withdrawal from the Paris Accord, NMA06 said that (b) (6), (b) (7)(C) decided to send said letter, and that (b) personal decision to support or not to support the U.S. withdrawal from the Paris Accord was not influenced by anything former Administrator Pruitt said.

Attachment:

1. Interview questions/Undated



CASE:
OI-HQ-2018-ADM-0039

INTERVIEWEE (if applicable):
(b) (6), (b) (7)(C)

DATE OF ACTIVITY:
8/16/2018

DRAFTED DATE:
8/21/2018

AGENT:
(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
Page 2 of 2

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL
1301 CONSTITUTION AVE, NW
WASHINGTON, DC 20004

CASE #: OI-HQ-2018-ADM-0039

CROSS REFERENCE #:

TITLE: Allegation of Inappropriate Lobbying

INTERVIEWEE (if applicable): NMA07

PREPARED BY: SA (b) (6), (b) (7)(C)

MEMORANDUM OF ACTIVITY
INTERVIEW

NARRATIVE:

To comply with the confidentiality agreement made between (b) (6), (b) (7)(C) representing the National Mining Association (NMA) (b) (6), (b) (7)(C), and the EPA Office of Inspector General, except for (b) (6), (b) (7)(C) and the OIG Special Agents who conducted the interview, the names of all other participants are omitted from this report.

On October 11, 2018, Special Agent (b) (6), (b) (7)(C) (b) (6), (b) (7)(C), Office of Investigations (OI), Office of Inspector General (OIG), Environmental Protection Agency (EPA), conducted a telephonic interview of NMA07. The interview was conducted in reference to a fact-finding inquiry pursuant to a congressional request to "develop a comprehensive factual record for instances where possible violations of the Antideficiency Act and the publicity or propaganda and anti-lobbying provisions of the Consolidated Appropriations Act (CSA) of 2017, may have occurred, during an April 2017 meeting between former Administrator Pruitt and the National Mining Association (NMA)."

Present for the interview were: (b) (6), (b) (7)(C) NMA; a second NMA attorney; and two other attorneys representing NMA07.

Prior to commencing the interview, SA (b) (6), (b) (7)(C) reiterated the purpose of the interview. NMA07 was asked a total of 10 questions. [See attachment 1]. The following is a non-verbatim account of the responses NMA07 provided to the questions.

CASE:
OI-HQ-2018-ADM-0039

DATE OF ACTIVITY:
October 11, 2018

INTERVIEWEE (if applicable):
NMA07

DRAFTED DATE:
October 16, 2018

AGENT(S):
(b) (6), (b) (7)(C)

RESTRICTED INFORMATION

Page 1 of 2

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.

During the initial stages of the interview, NMA07 stated (b) attended the April 24, 2017 meeting with former EPA Administrator Scott Pruitt. When asked if (b) recalled former Administrator Pruitt discuss the US withdrawal from the Paris climate accord, NMA07 said that (b) did not recall the specific issues former Administrator Pruitt discussed; however, (b) recalled former Administrator Pruitt discussing policies and mining, but nothing in specific. NMA07 was asked if during the speaking engagement former administrator Pruitt urged (b) to publicly support the US withdrawal from the Paris climate accord, (b) responded "no." When asked if any EPA employee asked (b) to publicly criticize the Paris climate agreement to pressure President Trump to withdraw from the accord, NMA07 answered "no."

NMA07 was asked if during the private meeting that former Administrator Pruitt had with the NMA (b) (6), (b) (7)(C), he asked (b) (6), (b) (7)(C) or the NMA to support the US withdrawal from the Paris climate accord, (b) (6), (b) (7)(C) responded "no." NMA07 also said that (b) (6), (b) (7)(C) was not asked by former Administrator Pruitt to pressure President Trump to withdraw from the Paris climate accord. Additionally, NMA07 stated that the meeting with former Administrator Pruitt did not influence (b) (6), (b) (7)(C) personal views, the views of (b) (6), (b) (7)(C) organization, or the views of the NMA concerning the Paris accord.

Attachment:

1. Interview questions/Undated



CASE:
OI-HQ-2018-ADM-0039
DATE OF ACTIVITY:
October 11, 2018

INTERVIEWEE (if applicable):
NMA07
DRAFTED DATE:
October 16, 2018

AGENT(S):
(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
Page 2 of 2

This report and any attachments are the property of the EPA Office of Inspector General, Office of Investigations and is loaned to your agency. It and its contents may not be reproduced or disclosed without written permission. This report contains information protected by the Privacy Act and is FOR OFFICIAL USE ONLY. Disclosure of this report to unauthorized persons is prohibited. See 5 U.S.C. 552a.